

memorandum

DATE: May 25, 2001
REPLY TO:
ATTN OF: Office of Environmental Policy and Guidance:Brown:6-6377
SUBJECT: Modification of the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Manifest System-Notice of Proposed Rulemaking
TO: Distribution

This memorandum is to request that DOE elements review and comment on proposed changes to the Uniform Hazardous Waste Manifest regulations and to the manifest form. On May 22, 2001, the Environmental Protection Agency (EPA) published a notice in the Federal Register (66 FR 28240-28318) requesting public comment on the proposed revisions.

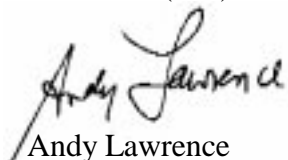
The draft regulations propose to further standardize the content and appearance of the current manifest form, and make the form more available from a greater number of sources. The revisions also propose manifest tracking procedures for the follow-up manifesting of treatment, storage, and disposal facility-rejected RCRA hazardous waste shipment loads.

In addition, the proposed revisions offer waste handlers the option to electronically complete, sign, and transmit the manifest form. The notice also provides an extensive series of questions and issues on which EPA requests comments. Areas of concern which could be addressed in DOE comments include:

- Would the proposed changes provide significant cost savings to DOE sites?
- Are there aspects of the proposed changes which would be burdensome to DOE sites?
- Are the proposed electronic manifest and electronic signature proposals compatible with present and future electronic systems at DOE sites?

The "Modification of the Hazardous Waste Manifest System" FR Notice of Proposed Rulemaking, accompanying fact sheet and support materials are available for viewing/downloading from the Internet at:
<http://www.epa.gov/epaoswer/hazwaste/gener/manifest/mods.htm>.

The Office of Environmental Policy and Guidance (EH-41) will consolidate DOE comments on the proposed revisions. EH-41 requests comments from interested DOE elements by **COB July 9, 2001**. All comments received by this date will be considered for inclusion in the preparation of the consolidated DOE response to EPA. Comments received after this date will be forwarded to EPA after the close of the comment period if new significant issues are identified. Please reference specific sections of the proposed rule when preparing comments to facilitate consolidation of similar comments. In order to expedite the preparation of the consolidated Departmental response, we request that comments be sent via electronic mail to Sharon Brown of my staff at sharon.brown@eh.doe.gov, or faxed to (202) 586- 3915. Ms. Brown's office telephone number is (202) 586-6377.



Andy Lawrence
Director
Office of Environmental Policy and Guidance